

**ADDENDUM TO THE FACT SHEET
FOR STATE WASTE DISCHARGE
PERMIT NO. ST-9187**

I. GENERAL INFORMATION

**TREE TOP, INC.
CASHMERE FACILITY
PO Box 0
Cashmere, WA 98815**

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on March 30, 2005 and accepted April 5, 2005. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- That the permittee is in compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for Tree Top Inc., Cashmere Facility, and discharge monitoring reports (DMRs) were reviewed and they indicate no change in the treatment characteristics of the effluent process or volume of wastewater have occurred. The Permittee has been in compliance with all conditions of the permit for the last five years.

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The effluent discharged by Tree Top, Inc. during the 36-month period from April 2002 through April 2005 is characterized for the following parameters in the table below:

2000 to 2005 Wastewater Discharge Characterization

Parameter	Units	Average Monthly Value	Max./Min. Average Monthly Value	
			Max	Min
BOD ₅	mg/L	2689	3453	1590
BOD ₅	lbs/day	6388.6	8706	2890
COD	mg/L	6414	9820	4231
DO	mg/L	5.7	12.8	0.10
Flow	MGD	0.30	0.40	0.10
pH	Standard Units	9.3	11.9	2.1
Temperature	°C	31.3	40	22
TSS	mg/L	1519	3112	702
TSS	lbs/day	373.4	13,500	4.1
Alkalinity	mg/L	444.5	920	182

The table below depicts the selected characterized parameters as a percentage of the permit limitations. It is obvious the facility is operating well within the existing permit limitations.

Wastewater Discharge as a Percentage of the Current Permit Limitations

Parameter	Units	Average Monthly Value	Max./Min. Average Monthly Value		Percent of Limit		Limit
			Max	Min	Avg.	Max	
BOD ₅	lbs/day	6388.6	8706.0	2890.0	26.1	NA *	24,000 avg.
Flow	MGD	0.30	0.40	0.10	68.2	75.0	0.044 avg. 0.533 max.
TSS	lbs/day	3736.4	13,500	4.1	39.3	NA	9,500 avg.

* NA means Not Applicable

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Tree Top Inc. for the discharge of wastewater to the Cashmere POTW. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet adequately addressed conditions and issues at the facility at the time the previous permit was issued. The Department has not received any information during the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

Minor updates or corrections to the fact sheet read as follows:

- The City of Cashmere owns the property that the BVF and sludge storage tank are located upon (FS introduction page and on page 5).
- Operations no longer include seasonal shutdowns of 6-8 weeks in the summer months (FS page 5). Plant operation is now essentially continuous, with relatively brief shutdowns, which normally take place outside of the peak processing season in the Fall.
- All product is now shipped from the Cashmere Plant as bulk concentrate in drums or tank trucks. Frozen product is no longer produced or packaged at the plant (FS page 7).
- Repairs to the City's industrial pretreatment facilities have been completed and the system is functioning as designed (FS page 7).

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next 5 year permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit

planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The City of Cashmere has not established local limits. The Department has determined that pollutant concentrations in the proposed discharge with only the technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through or hazardous exposure to POTW workers, nor will it result in unacceptable pollutant levels in the POTW's sludge. If any more-stringent local limits are determined by the City to be necessary in the future, such limits will take precedence over the respective less-stringent limits contained in the proposed permits.

The City of Cashmere may undergo a sewage treatment plant upgrade during the course of this permit cycle. At the time of this writing (2005), there exists a tentative plan for the City to decommission its lagoon treatment process and upgrade to a sequential batch reactor. This upgrade may have process implications for Tree Top Inc. which uses the City-operated bulk volume fermenter for pre-treatment. In the event the operation of the upgraded treatment plant requires more stringent limitations or a different suite of limitations on the Tree Top, Inc. effluent these limitations will be instituted either by a permit modification or renewal.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A - Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be reauthorized for 5 years.

APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application and draft reauthorization was published on July 27, 2005 in the Wenatchee World to inform the public that an application, draft permit and fact sheet are available for review and to invite comment on the reauthorization of this permit. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the publication date indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (509) 457-7105, or by writing to the address listed above.

APPENDIX B -- RESPONSE TO COMMENTS

City of Cashmere Comments:

In reviewing Tree Top reauthorization documents, the City of Cashmere is requesting the monitoring requirements for BOD and TSS in S2, in the permit be reduced from 2 times per week to once a week. The City of Cashmere, in an agreement with Tree Top, does the sampling and monitoring for this permit.

Prior to the BVF, Tree Top was discharging directly into the Cashmere wastewater treatment facility and the twice a week monitoring requirement was a necessary control measure. Since that is not the case anymore we hope you will consider reducing the BOD and TSS monitoring requirement. Please let me know if this change is accepted.

*Michelle Taylor
Public Works Coordinator*

Tree Top Inc., Cashmere Facility

I just discussed with the City of Cashmere/Tom Hastings the change in BOD monitoring frequency that the City is recommending for both of our permits. We would definitely support cutting the frequency in half. The much more frequent COD analyses will continue and provide a better picture of what's going on with loadings.

*Jeff W. Davis, P.E.
Tree Top, Inc., Corporate Engineering*

Departmental Response:

In light of the changes in wastewater flow through the BVF and relatively low loadings, the Department agrees that a reduction in BOD and TSS monitoring to 1/week is protective of the treatment works and will grant the request.